

Patent Application S/N 10/020,372

Attorney Docket P-2183

**REMARKS**

Claims 9-29 are pending and stand rejected and are therefore at issue.

***The Claims are Allowable Over the Cited Art*****Hoeksma**

The Examiner rejected Claims 9, 10, 12, 13, 16, 17, 19, 20, 23, 24, 26, and 27 as being anticipated by Hoeksma (U.S. Patent 6,271,835). Applicant respectfully traverses these rejections and requests reconsideration and withdrawal of this rejection.

Claim 9 recites first and second *types* of actuation of a key, the same key. Hoeksma teaches only a single type of actuation and of different keys to disambiguate multiple characters associated with a single key. For example, in Figure 2, the user would press key 223 and then the key two spaces to the left to unambiguously enter the letter "M", involving two separate keys and only a single *type* of actuation, namely, ordinary pressing of the keys.

Since Hoeksma neither teaches nor suggests first and second types of actuation of the same key to select from multiple symbols associated with the key, Claim 9 is allowable over Hoeksma. Claims 10-29 directly or indirectly recite the limitations of Claim 9 discussed above and are therefore similarly allowable over Hoeksma.

Patent Application S/N 10/020,572

Attorney Docket P-2183

**Hirshberg and King et al.**

The Examiner rejected Claims 9-29 as being unpatentable over Hirshberg (U.S. Patent 6,597,345) in view of King et al. (U.S. Patent 6,011,554). Applicant respectfully traverses these rejections and requests reconsideration and withdrawal of this rejection.

In support of this rejection, the Examiner asserted that one would be motivated to use the touch-and-drag disambiguation of Hirshberg in conjunction with the select-from-list disambiguation of King et al. Applicant respectfully submits that Hirshberg and King et al. teach distinct, competing, and incompatible disambiguation methods. Therefore, there is no motivation, suggestion, or teaching – in the prior art of record – to combine the references in the manner asserted by the Examiner.

In particular, King et al. teach only word, word segment, and numerical candidates for disambiguation in selection list 76 – see, e.g., the table at column 10, lines 40-62. While letters are included in selection list 76, they are only included once fully disambiguated. King et al. teach “two-stroke” interpretation at column 8, line 50, to column 9, line 8. Prior to complete disambiguation of the letter to be entered, King et al. teach no display of the letter candidates. King et al. teach “multiple-stroke” interpretation at column 9, lines 9-43. Here, too, King et al. teach no display of the letter candidates prior to complete disambiguation. It is not immediately clear how one would integrate character disambiguation of Hirshberg into the word disambiguation taught by King et al. Specifically, since the selection list 76 is used for word disambiguation, it is not clear how selection list 76 can also be used for character disambiguation as suggested by the Examiner.

In addition, Hirshberg teach that each key includes a representation of all characters

Patent Application S/N 10/020,572

Attorney Docket P-2183

associated with the key. Thus, the step of displaying those same characters in response to a first type of actuation as recited by Claim 9 would seem entirely superfluous. The Examiner asserted the motivation of "[maximization of] the efficiency and accuracy of text entry." However, it is unclear how replicating Hirshberg's imprinting of each key in selection list 76 of King et al. after each key press aids efficiency and why such replication is even helpful and not annoying. Thus, Applicant respectfully submits that there is not maximization of efficiency and accuracy in combining the teachings of King et al. and Hirshberg.

Applicant respectfully submits that the only real motivation of record is found in Applicant's own Specification. Claim 9 recites "displaying a representation of the two or more symbols" "in response to the detecting of the first type of actuation." The advantage of the recited displayed representation of the two or more symbols is shown in Applicant's Figures 5, 8, and 9 which illustrate that a rather large number of symbols can be associated with a single key if the user is permitted to navigate a table of symbols associated with a particular key. Accordingly, Claim 9 is allowable over Hirshberg and King et al.

Claims 10-29, either directly or indirectly, recite language similar to that discussed above with respect to Claim 9 and are therefore allowable over Hirshberg and King et al. for at least the same reasons.

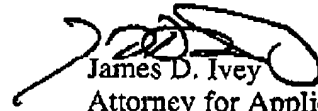
Patent Application S/N 10/020,572

Attorney Docket P-2183

**Conclusion**

Claims 9-29 are now in a condition for allowance and such action is respectfully requested. If the Examiner's next action is other than for allowance of Claims 9-29 or if the Examiner has any questions or comments with respect to the above identified case, the Examiner is respectfully invited to telephone the undersigned at (510) 336-1100.

Respectfully submitted,



James D. Ivey  
Attorney for Applicant  
Reg. No. 37,016

**IVEY, SMITH & RAMIREZ**  
3025 Totterdell Street  
Oakland, California 94611-1742  
Voice: (510) 336-1100  
Facsimile: (510) 336-1122

/home/james/iveylaw/LawPractice/Files/2183p/06FOA/Response to Office Action.sxw

Page 5 of 5